UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KARTHIKEYAN V. VEERA, Plaintiff, - against - AMBAC FINANCIAL GROUP, INC., et al., Defendants.	Civil Action No. 10-cv-4191 (HB)

DEFENDANTS' NOTICE OF MOTION AND
MOTION TO CERTIFY THE COURT'S JANUARY 6, 2011 ORDER
FOR INTERLOCUTORY APPEAL AND
TO STAY RELATED PROCEEDINGS PENDING RESOLUTION OF APPEAL

PLEASE TAKE NOTICE that Defendants Ambac Plan Administrative Committee, Ambac Compensation Committee, Ambac Plan Investment Committee, Diana Adams, Gregg. L. Bienstock, Jill M. Considine, Philip N. Duff, Robert Eisman, Thomas J. Gandolfo, Anne Gill Kelly, Sean T. Leonard, William McKinnon, Douglas C. Renfield-Miller, Timothy J. Stevens, Thomas C. Theobald, Laura S. Unger, and Henry D.G. Wallace (collectively, "Defendants"), by and through their undersigned attorneys, pursuant to 28 U.S.C. § 1292(b), the Local Rules of the Southern District of New York and the Individual Rules of this Court and upon the accompanying Memorandum of Law in Support of this Motion will move this Court, before the Honorable Harold Baer, in the United States District Court for the Southern District of New York, at Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 23B, New York, NY 10007-1312, on a date and at a time to be designated by the Court, for an Order granting Defendants' motion.

MOTION

This motion is brought on the grounds that interlocutory appeal of the Court's January 6, 2011 Order is appropriate pursuant to 28 U.S.C. § 1292(b), because (1) the order involves several controlling questions of law; (2) there are substantial grounds for a difference of opinion as to the these questions; and (3) resolution of these legal and controlling questions will materially advance the ultimate termination of this litigation. In conjunction with this motion, Defendants also request that the Court stay proceeding pending the appeal.

Dated: January 28, 2011

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

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Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing DEFENDANTS' NOTICE OF MOTION AND MOTION TO CERTIFY THE COURT'S JANUARY 6, 2011 ORDER FOR INTERLOCUTORY APPEAL AND TO STAY RELATED PROCEEDINGS PENDING RESOLUTION OF APPEAL has been filed and served by Notice of Electronic Filing pursuant to Rule 5(b)(2)(E), Federal Rules of Civil Procedure on this 28th day of January, 2011.

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/s/Gregory C Braden
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